

April 20, 1999

MEMORANDUM

SUBJECT: Alternative Testing Procedure for Application of
Method 9 to Multiple Emission Points under 40 CFR
60,
Subparts LL and 000

FROM: J. David Mobley, Acting Director /s/ J. David
Mobley
Emissions, Monitoring, and Analysis Division(MD-14)

TO: Addressees

In conjunction with the General Provisions of 40 CFR 60, the Standards of Performance for Nonmetallic Mineral Processing Plants (subpart 000) as well as the Standards of Performance for Metallic Mineral Processing Plants (subpart LL) require a three-hour performance test, using method 9 (40 CFR 60, appendix A) for fugitive emission points at each affected facility. The June 9, 1997 revision of subpart 000 allows crushers without emission capture systems to reduce the duration of method 9 observations of fugitive emissions for compliance from three hours to one hour if no readings are greater than 15 percent opacity. Even with this shorter duration, this requirement is still quite labor intensive as a result of the large number of emission points at the crushing and screening operations typical of sources affected by subpart 000 as well as subpart LL.

With this memorandum, we are approving an alternative procedure where a single visible emission observer may conduct visible emission observations for up to three subpart LL or subpart 000 fugitive, stack, or vent emission points within a 15-second interval. Use of this alternative procedure is subject to the following limitations:

1. No more than three emission points are read concurrently.
2. All three emission points must be within a 70E viewing

sector or angle in front of the observer such that the proper sun position can be maintained for all three points.

3. If an opacity reading for any one of the three emission points is within 5 percent opacity of the applicable standard, then the observer must stop taking readings for the other two points and continue reading just that single point.

The requirements of section 60.386 or 60.675, 60.11, and method 9 also apply. Although this alternative to method 9 opacity observation procedures may have utility for source categories other than subparts LL and OOO, the acceptability of using this alternative procedure must be reviewed and approved on a case by case basis for application to other than subpart LL and OOO facilities.

If you have any questions or require further information regarding this alternative, please contact Robin Segall at 919-541-0893.

ADDRESSEES

Bruce Buckheit, OECA/ORE/AED
 Jane Engert, OECA/OC/METD
 Linda Murphy, Region I
 Kathleen Callahan, Region II
 Judith Katz, Region III
 Winston Smith, Region IV
 David Kee, Region V
 Robert Hanneschlager, Region VI
 Art Spratlin, Region VII
 Richard Long, Region VIII
 David Howekamp, Region IX
 Anita Frankel, Region X

cc: Steve Frey, Region 9
 David McNeal, Region 4
 Bill Neuffer, OAR/OAQPS/ESD
 John Rasnic, OECA/OC/METD
 Deborah Thomas, OECA/OC/METD
 Scott Throwe, OECA/OC/METD

